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Attorneys for the State of Alaska

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

Plaintiff State of Alaska (“the State”) respectfully submits this Notice to a correct a statement by counsel for the State at the Court’s March 28, 2025 hearing. Counsel inadvertently misstated the origins of maps that appear at AR000426 and AR000219 and that were included on a PowerPoint slide presented at the hearing, which is attached as Exhibit 1.

Alaska v. U.S. Dep’t of the Interior, et al., Case No. 3:22-cv-00078-SLG
Plaintiff’s Notice of Correction

The map at AR000426 was included with the decision of the Bureau of Land Management (BLM), Alaska State Office, dated November 8, 2016 (AR000419) as Attachment 1. Footnote 1 of this decision (AR000419) describes the map as “US Exhibit 35, Original 84, *US v. State of Alaska*,” which presumably references the dispute that was the subject of the decision, *United States v. Alaska*, 530 U.S. 1021 (2000). Although this footnote describes the map as “contemporaneous” to Public Land Order 2214, the BLM Alaska State Office later asserted that the map was “provided by Steve Kopach [U.S. Fish and Wildlife Service] to Frank A. Hardt BLM via fax dated October 7 2004 enclosed indicating the map was a part of PLO No. 2214 description showing congressional intent and may not have actually been included in the Federal Register notice.” AR000519; accord AR000523–24 (facsimile cover sheet and map).

The map at AR000219 was Exhibit Q to BLM’s Answer filed with the Interior Board of Land Appeals in IBLA No. 2017-55 (AR000099). Footnote 53 on page 13 of the Answer (AR000111) describes the map as “maintained by the National Archives in a folder (#12) entitled ‘Reports & Briefing Materials’ within the . . . box (#1) entitled ‘Arctic National Wildlife Refuge Correspondence[.]’” This footnote further describes the map as “contain[ing] markings depicting 1961 caribou calving areas and movement corridors in the Range” and “maintained in a National Archives file that is dated ‘1957-1962’, . . . indicating that the underlying map was created in or prior to 1962.”

Counsel regrets any confusion caused by incorrectly identifying the origins of these maps.

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DATED: March 31, 2025.

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CERTIFICATE OF SERVICE

I certify that on **March 31, 2025**, the foregoing document was served electronically on all parties listed on the CM/ECF system.

/s/ *Kathleen C. Schroder*